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Attorney for Petitioner

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

Mahmoud KHALIL,

Petitioner,

v.

Donald J. TRUMP, in his official
capacity as President of the United
States; William P. JOYCE, in his
official capacity as Acting Field
Office Director of New York,
Immigration and Customs
Enforcement; Caleb VITELLO,
Acting Director, U.S. Immigration
and Customs Enforcement; Kristi
NOEM, in her official capacity as
Secretary of the United States
Department of Homeland Security;
Marco RUBIO, in his official capacity
as Secretary of State; and Pamela
BONDI, in her official capacity as

Case No. 25-cv-1963 (MEF)(MAH)

**CERTIFICATION OF MOLLY
BIKLEN IN SUPPORT OF
APPLICATION FOR
ADMISSION *PRO HAC VICE*
PURSUANT TO LOCAL RULE
101.1**

Attorney General, U.S. Department of
Justice,

Respondents.

I, **MOLLY BIKLEN**, of full age, do hereby certify as follows:

1. I am an attorney at the New York Civil Liberties Union Foundation (NYCLU),
where I also serve as the Interim Legal Director, and I have been requested to
represent Petitioner in this matter.
2. I am a member of good standing of the following bars:
 - a. New York State Bar: Admitted 2005
Appellate Division, Second Judicial Department
45 Monroe Place, Brooklyn, N.Y. 11201
 - b. U.S. Supreme Court: Admitted 2023
Clerk, Supreme Court of the United States
Admissions Office
One First Street, NE, Washington, D.C., 20543
 - c. U.S. Court of Appeals, Second Circuit: Admitted 2020
Thurgood Marshall United States Courthouse
40 Foley Square, New York, N.Y. 10007
 - d. Northern District of New York: Admitted 2009

James T. Foley U.S. Courthouse
445 Broadway, Suite 509, Albany, N.Y. 12207

- e. Southern District of New York: Admitted 2006

Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, New York, N.Y. 10007

- f. Eastern District of New York: Admitted 2006

United States District Court for the New York Eastern District
225 Cadman Plaza East, Brooklyn, N.Y. 11201

3. No professional disciplinary proceedings are pending against me in any jurisdiction and no professional discipline has previously been imposed on me in any jurisdiction.

4. In the event that I am admitted *pro hac vice*, I agree to:

- a. Make payment to the New Jersey Lawyer's Fund for Client Protection as provided by the New Jersey Court Rule 1:28-2(a) for each year in which I represent Petitioner-Plaintiff in this matter;
- b. Abide by the Rules of this Court, including any relevant disciplinary rules;
- c. Notify this Court immediately of any matters affecting my standing at the Bar of any other Court; and

- d. Have all pleadings, briefs, and other papers filed with the Court signed
by an attorney of record authorized to practice in the United States
District Court for the District of New Jersey.
5. In view of the foregoing, I respectfully request that I be admitted *pro hac vice*.

Pursuant to 28 U.S.C. § 1746, I affirm under penalty of perjury that the above
statements are true and correct.

Dated: March 21, 2025
New York, N.Y.

Respectfully Submitted,



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